



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

00-RU-0455

Mr. P.O. Strawbridge
Transition Manager
BNFL, Inc.
Richland, Washington 99352

Dear Mr. Strawbridge

CONTRACT NO. DE-AC27-96-RL13308 - REGULATORY UNIT (RU) PARTIAL APPROVAL OF AUTHORIZATION BASIS AMENDMENT REQUEST (ABAR), ABAR-W375-00-00014, REV. 0, PART A HAZARD ANALYSIS REPORT (HAR) SIGNIFICANT AND BOUNDING HAZARD EVALUATION & INITIAL SAFETY ANALYSIS REPORT (ISAR) FUNDAMENTAL ASPECTS OF DESIGN

- References:
- (1) BNFL letter from A. J. Dobson to D. C. Gibbs, RU, "Contract No. DE-AC06-96RL13308 – W375 – Request to Amend Authorization Basis Regarding New or Changed Significant and Bounding Hazard Evaluations and Fundamental Aspects of Design," CCN 012864, dated April 23, 2000
 - (2) BNFL letter from A. J. Dobson to D. C. Gibbs, RU, "Contract No. DE-AC27-96RL13308 – W375 – Errata to ABAR - W375-00-0014, Part A HAR Significant and Bounding Hazard Evaluation and ISAR Fundamental Aspects of Design Affecting the HAR," CCN 13259, dated May 19, 2000
 - (3) Authorization Basis Management Inspection Report, IR-99-007, dated November 10, 1995.
 - (4) BNFL letter from A. J. Dobson to D. C. Gibbs, RU, "BNFL AB Maintenance Corrective Action Plan (CAP) in Response to Corrective Action Notice CAN-2000-01," 00-RU-0329/CCN: 012568, dated April 14, 2000.

This letter is in response to References 1 and 2. The RU disapproves the referenced ABAR proposed changes to the fundamental aspects of design described in the ISAR, due to an inadequate and incomplete safety evaluation of these changes, as described below. The RU approves the referenced ABAR new significant and bounding hazards described in the HAR, as described below.

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This ABAR adds a new Appendix A to the ISAR identifying specific fundamental aspects of design and requests RU approval of two changes to the ISAR fundamental aspects of design. These specific changes are:

1. Receipt and storage of Low-Activity Waste (LAW) in the pretreatment facility instead of Double-Shell Tank 241-AP-106; and
2. washing and storage of High-Level Waste (HLW) solids in the pretreatment facility instead of receiving washed HLW solids from the tank farm operating contractor.

BNFL's safety evaluation of the proposed changes to the fundamental aspects of design does not contain a sufficient evaluation for the RU to conclude that the proposed changes are adequately safe. The RU identified on December 13, 1999, in Reference 3, that BNFL had failed to establish a process that ensured design-related aspects of the authorization basis (AB) were maintained current with the facility design. After a series of meetings and correspondence, BNFL issued Reference 4 for this and other related deficiencies. In Reference 4, BNFL agreed to submit information in order to "realize an effective and acceptable AB Maintenance Program." The absence of a safety evaluation for these changes is a significant deficiency in the execution of this corrective action plan. This deficiency, if uncorrected before BNFL's contract is terminated, will require prompt corrective action by the interim design contractor, CH2M Hill Hanford Group, Inc., before any further controlled changes to the fundamental aspects of design can be made. The RU strongly encourages BNFL to attempt to resolve this deficiency as part of its closeout actions prior to termination of its activities.

The ABAR also updates the HAR to include a new Appendix E, which adds 10 new significant or bounding hazards. The ABAR did not provide complete information explaining how BNFL selected the 10 new significant or bounding hazards. However, in a meeting between RU and BNFL personnel on June 12, 2000, the process for developing these new hazards was discussed. BNFL identified that a comprehensive list of significant or bounding hazards has not been developed. At the meeting, BNFL representatives stated that the selection of new significant or bounding hazards was based on new or increased hazards identified in the Integrated Safety Management (ISM) Cycle 1 and 2 process with expert judgment that these should be significant or bounding. As described in the enclosed Safety Evaluation Report (SER) the RU concluded that the identification of these new hazards was an enhancement of the AB. This portion of the ABAR is, therefore, approved.

As part of the amendment implementation process, please submit revised pages of the HAR identifying all revisions to date within two weeks. Please advise the RU promptly if BNFL resources needed to correct the ABAR deficiencies identified above, prior to termination of the Contract, are likely to be insufficient.

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Nothing in this letter should be construed as changing the Contract (DE-AC27-96-RL13308). If you

have any questions, please contact me or Rob Gilbert of my staff on (509) 372-0652.

Sincerely,

D. Clark Gibbs, Regulatory Official
Office of Safety Regulation
of the RPP-WTP Contractor

REG:RAG

Attachment

cc w/attch:
M. P. DeLozier, CHG
W. J. Taylor, ORP